

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

**U.S. BANK N.A., AS TRUSTEE FOR THE  
REGISTERED HOLDERS OF THE  
STRUCTURED ASSET SECURITIES  
CORPORATION, STRUCTURED ASSET  
INVESTMENT LOAN TRUST,  
MORTGAGE PASS-THROUGH  
CERTIFICATES, SERIES 2003-BC11,**

**Plaintiff,**

**v.**

**CASE No. 17-cv-00394-WES-LDA**

**MASOUD SHAKOORI-NAMINY a/k/a  
MASOUD SHAKOORI, BRENDA  
SHAKOORI-NAMINY, WILMINGTON  
TRUST, NATIONAL ASSOCIATION, AS  
SUCCESSOR TRUSTEE TO CITIBANK,  
N.A. AS TRUSTEE FOR BEAR STEARNS  
SECOND LIEN TRUST 2007-SV1,  
MORTGAGE-BACKED CERTIFICATES,  
SERIES 2007-SV1, HERITAGE CONCRETE  
CORP., THE FIREPLACE LLC, STEPHEN  
E. MOTTAU and HALLINAN CAPITAL  
CORPORATION,**

**Defendants.**

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**PLAINTIFF'S RULE 16(b) STATEMENT**

**SUMMARY OF FACTS**

On July 16, 2003, Defendant, Masoud Shakoori-Naminy aka Masoud Shakoori ("Shakoori"), executed a mortgage in favor of Option One Mortgage Corporation in the original principal amount of \$315,400.00 which was recorded with the Town of Exeter Land Evidence Records in Book 212, Page 1 (the "Mortgage"). The Mortgage encumbers the residential real estate located at 1541 Ten Rod Road, Exeter, Rhode Island (the "Property"). The Mortgage

secures a promissory note given by Defendant, Masoud Shakoori-Naminy aka Masoud Shakoori, to Option One Mortgage Corporation of even date and original principal amount (the “Note”).<sup>1</sup>

While generally admitting the existence of the mortgage loan and that Defendant, Masoud Shakoori-Naminy aka Masoud Shakoori, is in default, said Defendant denies the validity of the assignments of the mortgage; that a proper notice of default was sent; and, that the Plaintiff may foreclose the mortgage.<sup>2</sup>

### LEGAL ISSUES

Legal issues to be determined by the court include the Plaintiff’s status as the holder of the note and mortgage, whether Plaintiff has complied with the prerequisites per the loan documents prior to accelerating the note and whether Plaintiff is permitted to foreclose on account of the default of the mortgage terms.

Dated: December 7, 2017.

Respectfully submitted,

U.S. Bank N.A., as Trustee for the  
Registered Holders of Structured Asset  
Securities Corporation, Structured Asset  
Investment Loan Trust, Mortgage Pass-  
Through Certificates, Series 2003-BC11,

Plaintiff,  
By its Attorney,

//s/ Walter H. Porr, Jr., Esq.  
Walter H. Porr, Jr., Esq., BBO # 8967  
Korde & Associates, P.C.  
900 Chelmsford Street, Suite 3102

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<sup>1</sup> On April 18, 2014, Shakoori recorded a deed dated April 17, 2001, whereby he conveyed the mortgages property to himself and Defendant, Brenda Shakoori-Naminy, as tenants by the entirety. See Complaint, ¶ 24.

<sup>2</sup> For her part, Defendant, Brenda Shakoori-Naminy, uniformly answered the allegations of the Complaint with the statement: “Defendant is without sufficient information to either admit or deny the allegations contained in this paragraph and therefore denied the same.”

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 7, 2017, the foregoing document was filed through the electronic filing system with electronic service completed on all parties registered therein to receive notice and that any non-registered attorneys or parties have been served in accordance with the Federal Rules of Civil Procedure.

This document is available for viewing and downloading from the United States District Court's Electronic Filing System.

/s/ Walter H. Porr, Jr., Esq.  
Walter H. Porr, Jr, Esq., RI# 8967